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APR 14 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

April 14, 1995

VIA HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W. - Room 222
Washington, D.C. 20554

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Re: IC Docket No. 94-31

Dear Mr. Caton:

On behalf of the Harris Corporation - Farinon Division, we are filing and original and seven (7) copies of its Reply Comments in the above proceeding.

If additional information is needed, the Commission's staff is requested to communicate with us.

Very truly yours,

FLETCHER, HEALD & HILDRETH, P.L.C.

Leonard Robert Raish

Leonard Robert Raish

Counsel for Harris Corporation - Farinon Division

LRR:dlr
Enclosures

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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

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In the Matter of)

Preparation for International)

Telecommunications Union World)

Radiocommunications Conferences)

IC docket No. 94-31

**REPLY COMMENTS OF THE
HARRIS CORPORATION - FARINON DIVISION**

Pursuant to Section 1.430 of the Commission Rules, the Harris Corporation - Farinon Division ("Harris"), by its attorney, hereby submits reply comments to the responses received by the Commission in the Second Notice of Inquiry in the above-captioned proceeding (released January 31, 1995) ("Second Notice").¹

Harris views with much concern that the thrust of the comments filed in response to the Second Notice, as well as the Second Notice itself, seem to have been directed toward compatibility of MSS and FSS services without taking into account the impact upon the terrestrial fixed microwave bands involved. Point-to-point microwave communications have a substantial role in the telecommunications infrastructure of the US. It would be self defeating for the U.S. to propose spectrum allocations at WRC-95 that when carefully scrutinized are adverse to its own domestic interests.

The Commission has had the extensive proceedings underway involving satellite communications and terrestrial fixed microwave issues. Harris has participated extensively in those proceedings, e.g., Docket 92-9 dealing with PCS and Mobile Satellite Services, the "28

¹The deadline for filing Reply Comments in the Second Notice was extended from March 21, 1995 to April 14, 1995. Order (DA 95-421, released March 6, 1995).

GHz Band" proceeding, the "above 40 GHz" proceeding, the "Part 101" proceeding and TSB-10F Standards. These proceedings to a very great extent provided the backdrop for progressing the U.S. preparatory work for WRC-95.

Harris notes that separately TIA, through its Fixed Point-to-Point Communications Section, Network Equipment Division, has submitted Reply Comments to the Second Notice. Harris was a major contributor in the preparation of those comments and, therefore, supports them in the strongest possible way. The Commission is urged to take the TIA comments into account as it continues with preparation for WRC-95.

The difficulty facing the Commission in finding spectrum for the on-coming new technologies is appreciated. However, Harris suggests solutions are still available that would minimize the critical compatibility problems marked in spectrum sharing between MSS, FSS, and terrestrial fixed microwave services. One solution would be to take into account the recently released NTIA Report on U.S. National Spectrum Requirements - Projections and Trends (see page 80) wherein availability of the 3.7 - 4.2 GHz with TIA that these bands appear to be better candidates for MSS feeder links.


Finally, Harris would point out the terrestrial microwave services have taken much of the brunt in providing spectrum at 2 GHz for PCS and Emerging Technologies. In order to do this, it was understood that terrestrial microwave users would relocate to higher bands (primarily 6 GHz). It seems ironic that these users, having agreed to vacate the 2 GHz band to make way for MSS, should now be asked to make way again in the bands to which they are relocating so that MSS feeder links can be accommodated. Clearly the Commission should seek another solution

rather than burden the fixed microwave users with another disruption of their services to the American public and private sector.

In closing, Harris reiterates its support of the Reply Comments filed by TIA. The Commission is urged to take the foregoing into account as it proceeds with U.S. preparations for WRC-95.

Respectfully submitted,

HARRIS CORPORATION - FARINON DIVISION

By: 
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Its Attorney

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Dated: April 14, 1995